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# ***OAR Box 1824***

*Prepped by Charmelle Mathews*

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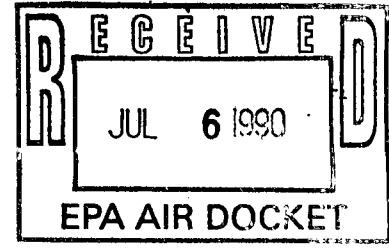


IV-D-18

Chrysler Motors Corporation

June 21, 1990

Mary T. Smith, Director  
Field Operations and Support Division  
EN-397F  
U.S. Environmental Protection Agency  
401 M Street S.W.  
Washington, DC 20460



Dear Ms. Smith:

**Re: HEARING ON FUELS AND FUEL ADDITIVES;  
WAIVER APPLICATION FOR MMT; FR 22947, JUNE 5, 1990**

Chrysler intends to submit comments on the above waiver application for use of MMT in gasoline. However, we will not be attending the hearing in Washington, DC on June 22, 1990.

Over the past several years, a considerable amount of information has been derived from test fleet vehicles and private vehicles which were fueled with gasoline containing MMT. This includes the time period since 1978 (when EPA first denied waiver applications for use of MMT in gasoline) during which Chrysler has monitored the effects of MMT on our Canadian vehicles.

The growing body of information causes Chrysler to be concerned that MMT may have a tendency to reduce the conversion efficiency of motor vehicle emission control systems. We intend to share this information with EPA to assist in the waiver process.

Chrysler is concerned about the effects of fuels, maintenance and other elements affecting the vehicle that are beyond our control, because auto manufacturers have a responsibility to assure that their cars and trucks comply with the emission standards for the useful life of the vehicle, which is expected to be substantially increased under the pending Clean Air Act amendments. As emissions standards continue to increase in stringency, it will become increasingly more difficult to meet them for the full useful life and avoid in-use failures that can result in very costly recalls and warranty claims.

I will contact you in a few weeks to let you know when our comments will be available.

*G. E. Allardyce*

G. E. Allardyce  
Executive Engineer  
Chrysler Corporation  
Certification & Regulatory Programs

GEA:sh